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9 Attorneys for Plaintiff J.P. by and through his
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11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA — OAKLAND

13 J.P., by and through his Guardian Ad Litem,
SHANNON VILLANUEVA,

Case No.: 3:17-cv-5679-LB

14 Plaintiff,

**STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE-
MANAGEMENT SET BY DKT 203**

15 v.

16 COUNTY OF ALAMEDA, DIANE DAVIS
MAAS, SUE MAY, TRIAD FAMILY
SERVICES, MARIA REFUGIO MOORE, and
17 Does 1-30 inclusive,

Complaint Filed: October 2, 2017
Trial Date: November 7, 2022
Status: SETTLED

20
21 Plaintiffs J.P., by and through his Guardian Ad Litem, Shannon Villanueva (“Plaintiff”) and
22 Defendants COUNTY OF ALAMEDA and TRIAD FAMILY SERVICES (collectively
23 “Defendants”), jointly submit this Stipulation and [Proposed] Order.

24 The parties are meeting and conferring to finalize language in a Settlement Agreement while
25 the plaintiff continues to work with Medi-Cal to attempt to acquire a final lien amount. Plaintiff
26 continues to work with supervising staff at Medi-Cal, who continue to demand additional
27 information and confirmation from J.P.’s care team, to acquire the final lien amount in the next two
28 weeks and hope to obtain the final lien amount shortly. But with the holidays, it may be prudent to

1 estimate this process may not be complete before December. The parties anticipate finalizing the
 2 Settlement Agreement and drafting the Petition for Minor's Compromise within 30 days once the
 3 Medi-Cal lien issue is resolved.

4 In addition, Jody Struck, counsel for Defendant County of Alameda will be attending a
 5 Mandatory Settlement Conference beginning at 10:00 a.m. on December 1, 2022 with Judge Ryu.
 6 The Mandatory Settlement Conference was set before the further Case Management Conference in
 7 this case, but the parties were hopeful all issues would be resolved prior to December 1, 2022, thus
 8 avoiding the scheduling conflict.

9 Although progress has been made, the parties now diligently and jointly request, based on
 10 good cause, that this Court continue the December 1, 2022 Case Management Conference to early
 11 2023 to allow the parties sufficient time to acquire the lien amount from Medi-Cal which will then
 12 allow parties to finalize the Settlement Agreement and move forward in drafting the Petition for
 13 Minor's Compromise. The parties greatly appreciate the Court's assistance in this matter.

14 IT IS SO STIPULATED AND REQUESTED.

15 Respectfully Submitted,
MATHENY SEARS LINKERT JAIME, LLP

16 By:

17 Date: _____ */s/ Ronald E. Enabnit*
 18 _____ Ronald E. Enabnit,
 19 Attorney for Defendant
 TRIAD FAMILY SERVICES

21 **HAAPALA, THOMPSON & ABERN, LLP**

22 By:

23 Date: _____ */s/ Jody Struck*
 24 _____ Jody Struck
 25 Attorney for Defendants
 COUNTY OF ALAMEDA

DE VRIES LAW, P.C.
 100 Pine Street, #1250
 San Francisco, CA 94111

KESSLER LAW OFFICE

Date:

By: /s/ Darren J. Kessler

Darren J. Kessler
Attorney for Plaintiff J.P., by and through
his GAL, SHANNON VILLANUEVA

DE VRIES LAW, P.C.

Date: _____

By: /s/ *Lizabeth N. de Vries*

Lizabeth N. de Vries
Attorney for Plaintiff J.P. by and through his
GAL, SHANNON VILLANUEVA

ELECTRONIC CASE FILING ATTESTATION

I, Lizabeth N. de Vries, am the ECF user whose identification and password are being used to file the foregoing documents. Pursuant to Civil Local rule 5.1(i), I hereby attest that concurrence in the filing of these documents has been obtained from each of its signatories.

DE VRIES LAW, P.C.

Date: _____

By: /s/ *Lizabeth N. de Vries*

Lizabeth N. de Vries
Attorney for Plaintiff J.P. by and through his
GAL, SHANNON VILLANUEVA

1 **[PROPOSED] ORDER**

2 Having considered the stipulation of the parties and good cause appearing, the case-
3 management previously set by DKT 203 for December 1, 2022 at 9:30 a.m. is hereby continued to
4 January 26, 2023 at 9:30 a.m./~~p.m.~~ Case Management Statements due January 19, 2023.

5 **IT IS SO ORDERED.**

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7 Date: November 18, 2022



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11 Honorable Laurel Beeler
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13 United States District Court Judge
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